CENTERS FOR MEDICARE & MEDICAID SERVICES
CENTER FOR PROGRAM INTEGRITY

Open Payments

Applicable Manufacturers & Applicable GPOs:

2016 Program Year Registration, Data Submission, and Attestation

OPEN PAYMENTS

CREATING PUBLIC TRANSPARENCY INTO INDUSTRY-PHYSICIAN FINANCIAL RELATIONSHIPS

January 2017

CMS Disclaimer: This information is a summary of the final rule implementing Open Payments (Medicare, Medicaid, Children's Health Insurance Programs; Transparency Reports and Reporting of Physician Ownership or Investment Interests [CMS-5060-F], codified at 42 CFR Parts 402 and 403). The summary is not intended to take the place of the final rule which is the official source for information on the program.

Agenda

- Target Audience & Learning Objectives
- Reference Materials
- Program and System Overview
- Reporting Entity Registration and Recertification
- Data Submission & Error Correction
- Final Submission & Attestation
- Program Year 2016 System Enhancements
- Next Steps & Available Resources

Target Audience & Learning Objectives

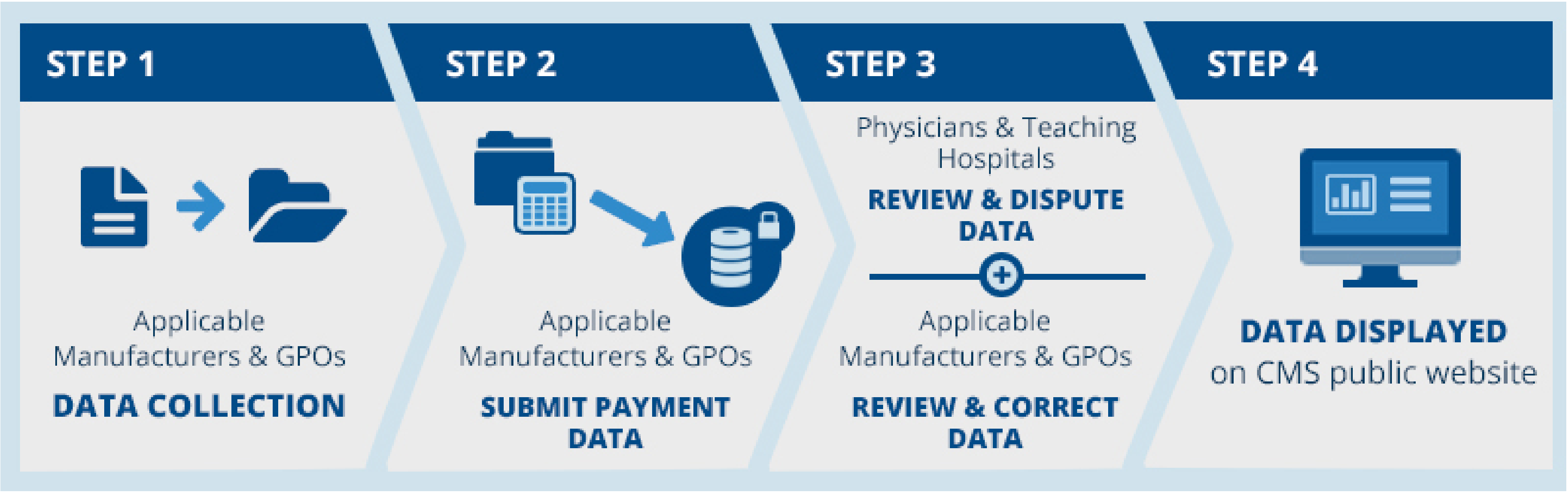
- Target audience:
  - Individuals and applicable manufacturers and applicable group purchasing organizations (collectively referred to as reporting entities) who must submit data to the Open Payments system to comply with regulatory and reporting requirements
- Learning objective:
  - To provide high-level instructions on how to register, submit, and attest to data for the 2016 Program Year (PY)
  - Open Payments system enhancements for PY 2016

Reference Materials

- Reference Materials:
  - Open Payments User Guide, Quick Reference Guides, and other resources referenced here, can be found on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/About/Resources.html)

Program and System Overview

Open Payments Process Flow



Reporting entities collect payment data for a program year, which runs from January 1 to December 31

Reporting entities submit their data for the program year to the Open Payments system

Physicians and teaching hospitals review and, if necessary, dispute submitted data. Reporting entities correct the data to resolve any disputes

Data for that program year is published for public viewing in accordance with the publication guidelines

2016 Program Year Timeline

Note: Review and Dispute activities start on April 1st and can continue until end of the calendar year. The end dates provided on this slide are the cutoff for disputes and corrections to appear in the June 30 data publication.

***Anticipated date**

Reporting Entity Registration and Recertification

Two-Step Registration Process

Enterprise Identity Management (EIDM)

- Register self in EIDM
- Request access to the Open Payments system

Open Payments System

- Register self (and entity, if applicable) in the Open Payments system

1. Before registering for the Open Payments system, you must first register with CMS's Enterprise Identity Management (EIDM) system and request access to the Open Payments system
2. Once you have successfully registered with EIDM, you can register yourself (and if necessary, your reporting entity) with the Open Payments system

If you registered for EIDM and requested access to Open Payments in the past, it is not necessary to do so again

EIDM Overview

- **Successful registration in both EIDM and the Open Payments system is required for each individual who wishes to access the Open Payments system and perform any system-related functions**
- Individuals who request electronic access to CMS-protected information or systems (such as EIDM) must first have their identities verified
- For returning EIDM users who need help with User ID or password, visit https://portal.cms.gov or contact the Open Payments Help Desk at openpayments@hhs.cms.gov or 1-855-326-8366
- EIDM will lock a user account after 60+ days of inactivity; EIDM will deactivate a user account after 180+ days of inactivity
- For step-by-step instructions on how to register in EIDM, refer to the Quick Reference Guide “Enterprise Identity Management (EIDM) Registration,” available on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/About/Resources.html)

Open Payments System Registration

- Reporting entities must register in the Open Payments system to submit, attest, correct, and view records of payments, other transfers of value, and ownership/investment interests
- Open Payments system registration can only be completed after EIDM registration
- Reporting entities must be registered and individuals who wish to use the system on behalf of a reporting entity must also register themselves
- The individual who registers the reporting entity will be required to register him/herself for the role of officer with the reporting entity in the Open Payments system
- Prepare your information before beginning registration. Registration must be completed in one session, as users cannot save partially completed entries for completion at a later time and sessions are timed out after 30 minutes of inactivity
- Refer to the quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Recertification" and the Open Payments User Guide for additional guidance on system registration available on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/About/Resources.html)

Entity Recertification

- Before performing any system-related functions in the Open Payments system in 2017, reporting entities that registered in prior years must recertify in the Open Payments system
- **Reporting entities can recertify themselves starting January 1 of each calendar year. Once recertified, entities can perform user role management activities as well as view and download previously submitted data. However, users still cannot submit new data, edit data, or delete existing data until the start of the submission period (New for PY 2016)**
- Recertification must be completed by an individual who holds an officer role with the reporting entity in the Open Payments system

Entity Recertification (cont.)

- Recertification confirms reporting entity details in the Open Payments system are accurate
- During recertification, officers can update outdated or inaccurate reporting entity information
- Entity information can be updated at any time, not only during recertification.
- Re-vetting of the reporting entity will occur if any of the following fields in the entity's profile change:
  - Entity's Legal Name
  - Tax Identifier Number (TIN)/Employee Identification Number (EIN)
  - Dun and Bradstreet DUNS Number (D&B)
- Quick reference guide "Applicable Manufacturer and Applicable GPO Registration and Recertification" and the Open Payments User Guide provide additional guidance on the recertification process

Vetting

- After the reporting entity registration has been submitted in the Open Payments system or a previously registered entity's name, TIN/EIN, or DUNS number is changed in the entity's profile, the system will vet the reporting entity
- Vetting verifies that the applicable manufacturer or applicable GPO is a valid reporting entity
- The officer will receive an email confirming vetting success or failure. If vetting was successful, the officer may begin performing actions in the system for the reporting entity
- To ensure successful vetting, provide as much information as possible during registration
- If vetting fails, the officer may update the profile information and re-submit for vetting. Officers can also contact Open Payments Help Desk (openpayments@cms.hhs.gov or 1-855-326-8366) after the first failed attempt
- If vetting fails after three re-submissions, the officer must contact the Open Payments Help Desk (openpayments@cms.hhs.gov or 1-855-326-8366) for assistance
- Entities with foreign addresses must contact Open Payments Help Desk (openpayments@cms.hhs.gov or 1-855-326-8366) for manual vetting
- **No system actions are permitted on behalf of a reporting entity until it has been successfully vetted**
- Refer to the Open Payments User Guide for more information on vetting

Data Submission & Error Correction

Data Submission Process

- **During the 2017 data submission period, reporting entities are required to submit data regarding payments and other transfers of value made to covered recipients, and ownership or investment interests, for the 2016 program year**
- Data can be submitted to the Open Payments system in two ways:
  - Bulk file upload using either character-separated values (CSV) files or a ZIP file containing CSV files
  - Manual data entry of each data record through the Open Payment system's Graphic User Interface
- Reporting entities may choose to use either or both of these submission methods to report transactions
- CMS encourages reporting entities with a smaller volume of records to use manual data entry, as preparing CSV files requires data handling expertise and may require additional software tools in order to prepare the files

Data Submission Process (cont.)

- The-system checks each record for validation and matching errors
- **All errors must be corrected before final submission and attestation can occur**
- Submitters will receive notifications, either via onscreen messages or emails, at various stages of the upload and submission process. These will notify the submitter of the success or failure of their submissions and note the existence of any matching or validation errors
- Reporting entities may choose to have their data prepared and submitted by a third-party organization
- The role of submitter is the only role third-party companies can fulfill within the Open Payments system on behalf of a reporting entity; attestation must be completed by the reporting entity
- Refer to the submissions-related quick reference guides and the Open Payments User Guide for more information on data submission

Data Submission Process Flow

STEP 1

Log into Open Payments System

Submitter logs into Open Payments System

STEP 2

Upload Data

Two Options Available:

1. Bulk Data Upload (CSV Files)

2. Manual Entry (Graphic User Interface)

<u>Bulk File Upload</u>:
- **Accepted file formats include CSV or ZIP files containing CSV files**
- **Files may not exceed 250MB in size**
- **Use the correct template for desired program year and payment type**

<u>Manual Data Entry</u> using Graphic User Interface (GUI)

STEP 3

Data Validation & Matching

System performs data validation & matching:

- **For bulk file upload, system notifies failure or success via email**
- **For manual data entry, validation checks are real time and are displayed on the user interface**

STEP 4

Final Submission

Once data has been successfully uploaded and is free of validation and matching errors, the submitter will perform final data submission

STEP 5

Attestation

- **Attester receives an email notification once records are in "Ready for Attestation" status**
- **Attester attests to the accuracy, completeness, and timeliness of the data**
- **Attestation is conducted for all records for that program year, across all three payment types**

Bulk File Upload

- Reporting entities with large volumes of data to report will likely want to upload bulk data files
- The two acceptable file formats for bulk data upload are:
  - CSV (character-separated values) that use pipes (|) as field delimiters
    - Sample files, also referred to as templates, are available on the Resources page of the Open Payments website and within the Open Payments application for submitters
  - ZIP (must contain only pipe-delimited CSV files)
- Maximum file size accepted, for both CSV and ZIP files, is 250 MB. There is no limit to how many files may be uploaded into the system
- Each file can contain only one payment type: general payments, research payments, or ownership and investment interests
- **General and Research templates have been revised for 2016 program year submissions**
- Refer to the quick reference guide "Bulk File Upload" and the Open Payments User Guide for additional guidance on bulk file uploading

Manual Data Entry

- CMS encourages reporting entities with smaller volumes of data to use manual data entry
- Manual data entry is made via the Graphical User Interface
- Manual entry can be used in conjunction with bulk data file uploads
- Quick reference guide "Manual Data Entry" and the Open Payments User Guide provide additional guidance on completing manual data submission

Validation and Matching Errors

- After records are uploaded, the Open Payments system will begin validating and matching the data
- This may uncover errors that must be corrected for the records to be submitted successfully
- There are three basic types of errors for data submitted to the Open Payments system:
  1. File validation errors
  2. Record content errors
  3. Data matching errors

Validation and Matching Errors (cont.)

1. **File Validation Errors:** Applies only to records submitted via bulk file upload. The system will fail a file's upload if validation errors are detected. File errors may include:
   - Submitted file size is larger than 250 MB
   - File is not in CSV or ZIP format
   - File is missing a header row and/or columns, or has incorrect number of columns
   - Payment category of the sample file used to create the submitted file and payment category selected when uploading the file do not match
   - Resubmission File Indicator does not correspond with the selection on the user interface (New for PY 2016)

   For a complete list of file validation errors, refer to the quick reference guide "Identifying and Correcting Validation and Matching Errors" and the Open Payments User Guide

Validation and Matching Errors (cont.)

2. **Record Content Errors:** The system will fail a record if the information in the record does not match the formatting accepted by the system

   Record formatting is explained in detail in Submission Data Mapping Documents available on the Resources page of the Open Payments website

   Manually entered records undergo formatting checks during data entry

   Records submitted via bulk file upload undergo checks as part of the file submission process

   Common content errors include:

   - Invalid characters in the data element
   - Required data element left blank
   - Too many or too few characters in the data element
   - Invalid value in the data element

Validation and Matching Errors (cont.)

3. **Data Matching Errors:** The system will fail a record if the covered recipient information in a record cannot be matched to a valid covered recipient using existing CMS resources and information

   Examples of data matching errors include:

   – Teaching Hospital Name in a record does not match the value for the corresponding Hospital Name in the CMS Teaching Hospital List

   – The Teaching Hospital Address in a record does not match the value for the corresponding Teaching Hospital NPPES Business Address in the CMS Teaching Hospital List

   – Physician Name in a record does not match the information in validation sources used by Open Payments

Error Notifications

- **File Validation Errors** are communicated to submitters via email
- **Record Content Errors** are communicated based upon the data submission method:
  - Bulk file upload: Errors are communicated through a notification email or an online error report
  - Manual data entry: Errors are communicated during data entry in real time
- **Data Matching Errors** are communicated through emails regardless of how they were submitted
- Error reports contain error codes that identify the reason for file or record failure. Error codes are explained in the "Error Code Key," available on the Resources page of the Open Payments website
- Submission errors must be corrected and the records re-submitted for records to be successfully submitted
- Refer to the Quick reference guide "Identifying and Correcting Validation and Matching Errors" and the Open Payments User Guide for additional guidance

Final Submission & Attestation

Final Data Submission

- All records uploaded to the Open Payments system, either via bulk file upload or manual entry, must go through a final data submission
- Final data submission can begin when all records for a payment category (i.e., general, research, ownership) are free of errors and are in "Ready for Submission" status
- All records in a payment category for a program year go through final submission simultaneously regardless of how they were submitted

Attestation

- Attestation legally affirms and certifies that information submitted on behalf of a reporting entity is accurate and complete – only users holding the role of attester may attest
- Attestation occurs after all errors are corrected, matching is successful, records have undergone final submission, and all records for the program year are in "Ready for Attestation" status
- Attesters will receive email notification for initial attestations, when there are records in "Ready for Attestation" status
- Re-attestation is required when any previously attested data is changed, including any data fields, delay in publication indicator, or the record is deleted
- When re-attestation is required, use the "**Notify Attester**" button to send an email notification. Note: The "Notify Attester" button will only be enabled if there are records in "Attested" or "Ready for Attestation" status

Attestation (cont.)

- Attestation must be done for **all** records submitted for a program year; **not** individual records, file submissions, or payment types
- Attestation must be completed by the reporting deadline for the program year for the submission to be considered “on time”
- Data submissions that are not attested to by the reporting deadline will be considered late and may be subject to civil monetary penalties

Assumptions

- Attester has the option of submitting an assumptions statement during the attestation process
- Assumptions explain the reasonable assumptions made and methodologies used when reporting payments, other transfers of value, or ownership or investment interests
- Assumptions are documented in a free-form text field during the attestation process
- Assumptions cannot be longer than 4,000 characters (including spaces) and can be edited later
- Quick reference guide “Final Submission and Attestation” provides additional guidance on attestation process
- Refer to Open Payments User Guide for a complete list of attestation statements

Delay in Publication

- Reporting entities can request a one-year delay in publication for eligible payment records, as well as request a renewal of the delay after a previous one expires
- Eligible payment records may be delayed for publication if the payment or other transfer of value is related to:
  - Research or development of a new drug, device, biological, or medical supply;
  - Research or development of a new application of an existing drug, device, biological, or medical supply; or
  - Clinical investigations regarding a new drug, device, biological, or medical supply
- The request for a delay must be renewed each year. If the request is not renewed each year by the end of the data submission period, the record will be eligible for publication in the next publication cycle
- Records can be renewed via bulk file upload or manual data entry
- After renewing any requests for delays in publication, all records for that program year must be re-attested to for the request for delay to be confirmed
- Quick reference guide "Requesting or Updating a Delay in Publication" provides additional guidance on the delay in publication process

Program Year 2016 System Enhancements

Registration Enhancements

- **Reporting entities can recertify themselves in the Open Payments system starting January 1st of each calendar year**
  - Once recertified, entities can perform user role management activities as well as view and download previously submitted data; however, users still cannot submit new data, edit data, or delete existing data until the start of the submission period
- **Reporting entities can deactivate users**
  - A user holding the role of an officer with a reporting entity can deactivate another user from that entity via "Manage Roles" tab under Manage Entities page
  - A user cannot deactivate him- or herself from an entity using the Open Payments system; self-deactivation can only be accomplished by contacting the Open Payments Help Desk

Registration Enhancements

- **Vetting status of reporting entities shown on Home Page**
  - Vetting statuses of all reporting entities affiliated with a user are visible on that user's Open Payments home page
  - If an entity failed vetting, the entity's name on the home page will contain a hyperlink to the entity's profile for editing and resubmission

Data Submission Enhancements: New Bulk File Upload Capabilities

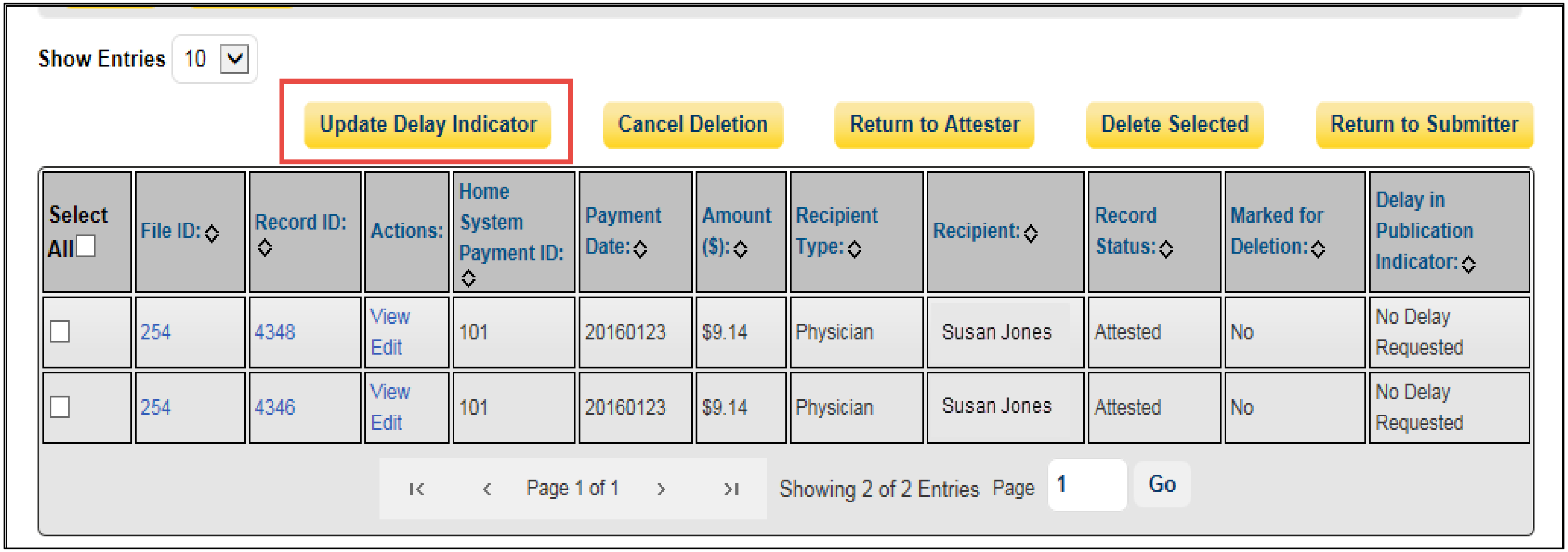
- **Bulk File Upload has two new capabilities**
  - In addition to adding new records to the system and resubmitting previously submitted records, you can use the bulk file upload process to:
    - Delete existing records from the Open Payments system
    - Update the delay in publication status of existing records in the Open Payments system
  - The purpose of a record (New, Resubmission, Delete, Update Delay) is communicated via the Resubmission File Indicator field
  - Refer to quick reference guide “Bulk File Upload” or the User Guide for more information on the Resubmission File Indicator changes

Data Submission Enhancements: Delay in Publication

- **Updated – Process for updating the Delay in Publication indicator**
  - Users can update the delay in publication field through two new methods
    1. Submit a bulk file with the “Resubmission File Indicator” data element set to “R” for the requested records
    2. Manually update records via the “Update Delay Indicator” button in the Open Payments system
  - The two new methods will only change the Delay in Publication field. Submitted records will be subject to limited data validations and will not undergo matching
  - To be eligible for this process, records must be in “Ready for Submission,” “Ready for Attestation,” or “Attested” status. Once the Delay in Publication field has been updated, the records will be placed in “Ready for Submission” status
  - Resubmission or manual editing of the record can also update the indicator but will trigger validations and matching.

Data Submission Enhancements: Delay in Publication

- The new methods cannot be used to add a delay to a record that wasn't previously delayed. To do that, resubmit record or use manual edit.
- For more information, refer to the quick reference guide “Requesting or Updating a Delay in Publication," which can be found on the Resources page of the CMS Open Payments website



Select All	File ID:	Record ID:	Actions:	Home System Payment ID:	Payment Date:	Amount ($):	Recipient Type:	Recipient:	Record Status:	Marked for Deletion:	Delay in Publication Indicator:
	254	4348	View Edit	101	20160123	$9.14	Physician	Susan Jones	Attested	No	No Delay Requested
	254	4346	View Edit	101	20160123	$9.14	Physician	Susan Jones	Attested	No	No Delay Requested

Data Submission Enhancements: Deletion via Bulk File Upload

- **Reporting entities can delete records via bulk file upload**
  - In addition to the current processes to delete records and files via the user interface, users can now delete records via bulk file upload
  - Users must create a bulk file of records to be deleted and set the “Resubmission File Indicator” data element for these records to “D” (Delete)
  - Refer to the Submission Data Mapping Document to see the required fields for record deletion.
  - For more information on deletion, refer to the quick reference guide “Record Deletion,” which can be found on the Resources page of the CMS Open Payments website

Open Payments System Enhancements: Record Changes

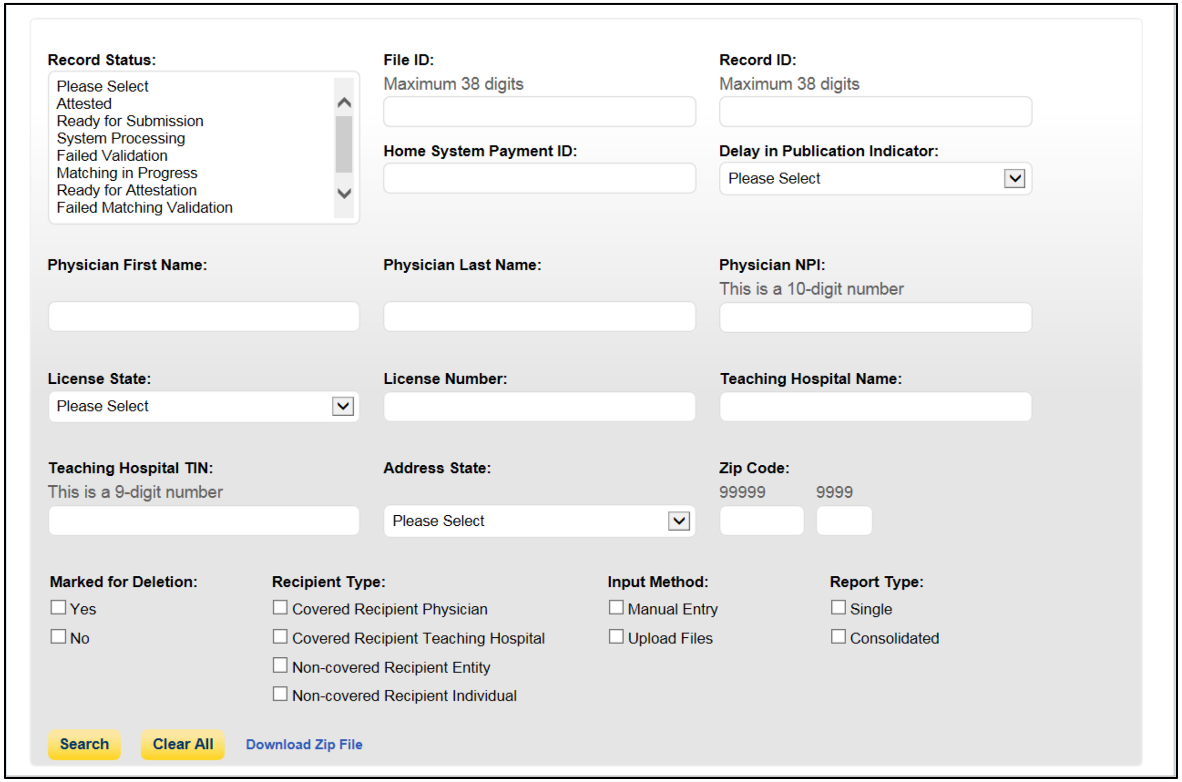
- **Record field requirements for PY 2016 and upcoming years differ from record field requirements for PY 2013-2015**
  - Bulk data files must be prepared using the CSV Sample Files for the records' program year
    - CSV Sample Files are available for PY 2013-2015 and for PY 2016 and Upcoming Years
  - The product information page in the manual data entry process differs for records for PY 2013-2015 and records for PY 2016 and upcoming years
  - Guidance is provided in the Submission Data Mapping Document, which is now available in two versions:
    - PY 2013-2015
    - PY 2016 and Upcoming Years
  - Sample files and Submission Data Mapping Documents for all program years are available on the Resources page of the Open Payments website (https://www.cms.gov/OpenPayments/About/Resources.html)

Data Submission Enhancements: General

- **Submitted Records Download Report Updated**
  - The “Amount ($)” column has been re-named “Total Amount of General or Research Payment,” which displays amounts only for general and research payment records
  - To report relevant information in ownership or investment interest records, the download report has two new columns: “Dollar Amount Invested” and “Value of Interest”
- The “**Submit Test File**” button is no longer available in the Open Payments system

Data Submission Enhancements: General

- **Search criteria expanded for reporting entities record searches**
  - The search function has been expanded to allow for searches by physician name, teaching hospital name, National Provider Identifier (NPI), license state and number, address state, and zip code



Data Submission Enhancements: General

- **Updated record grids on Payment Category pages**
  - The “Actions” column is now the fourth column from the left in the grid and can be accessed without scrolling
  - To further reduce the need for scrolling, a few columns have been removed from the grid
  - The grid for ownership or investment interest records has been modified to replace the field “Amount ($)” with two columns: “Dollar Amount Invested” and “Value of Interest”

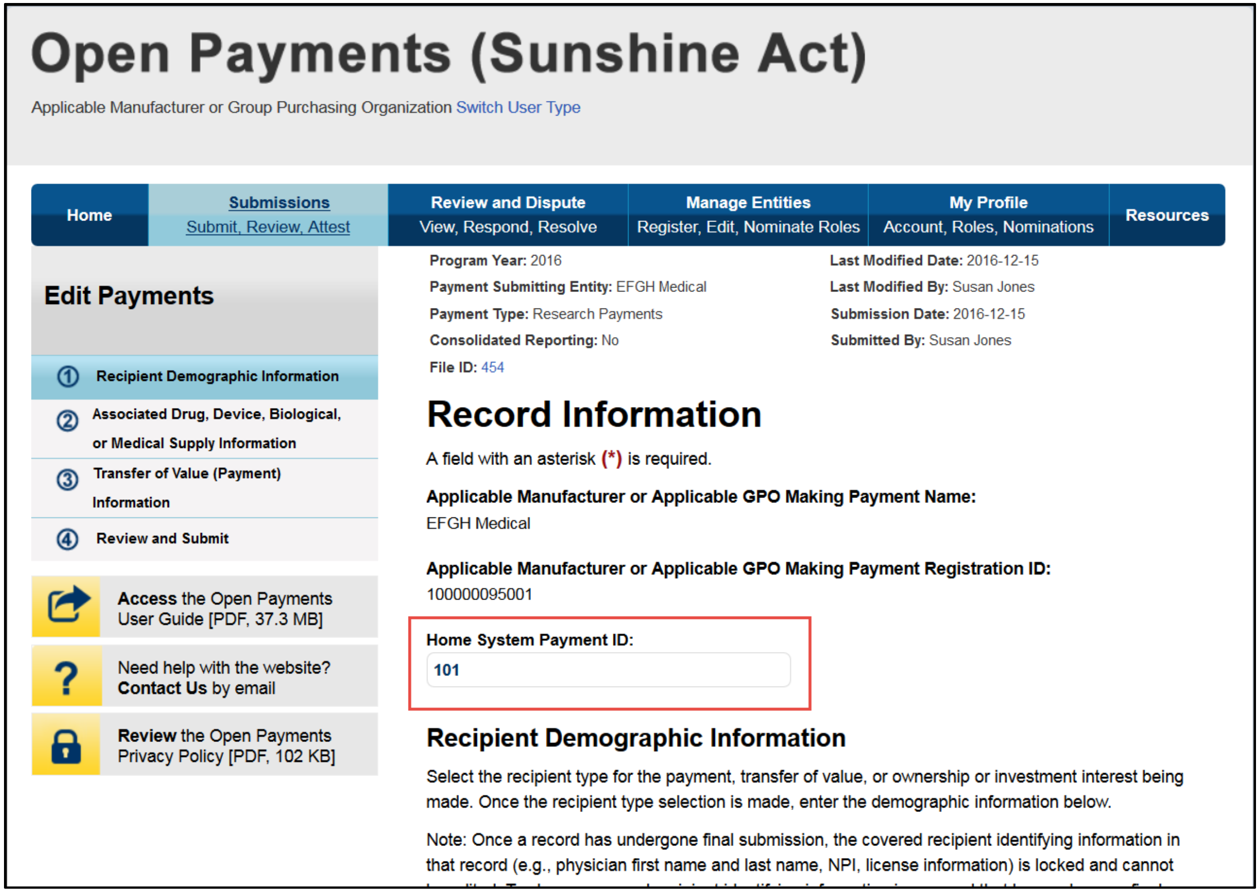
Cancel Deletion | Return to Attester | Delete Selected | Return to Submitter

Select All	File ID:	Record ID:	Actions:	Home System Payment ID:	Payment Date:	Dollar Amount Invested:	Value of Interest:	Recipient:	Record Status:	Marked for Deletion:	Delay in Publication Indicator:
	1314047	1253018	View Edit	testing HSPID	20141010	$100.99	$ 2,567	Robert Newton	Ready for Submission	No	No Delay Requested
	1314045	1253020	View Edit		20141010	$100.97	$ 8,600	Jack Dorsey	Ready for Submission	No	No Delay Requested

Page 1 of 1 Showing 2 of 2 Entries Page 1 Go

Data Submission Enhancements: General

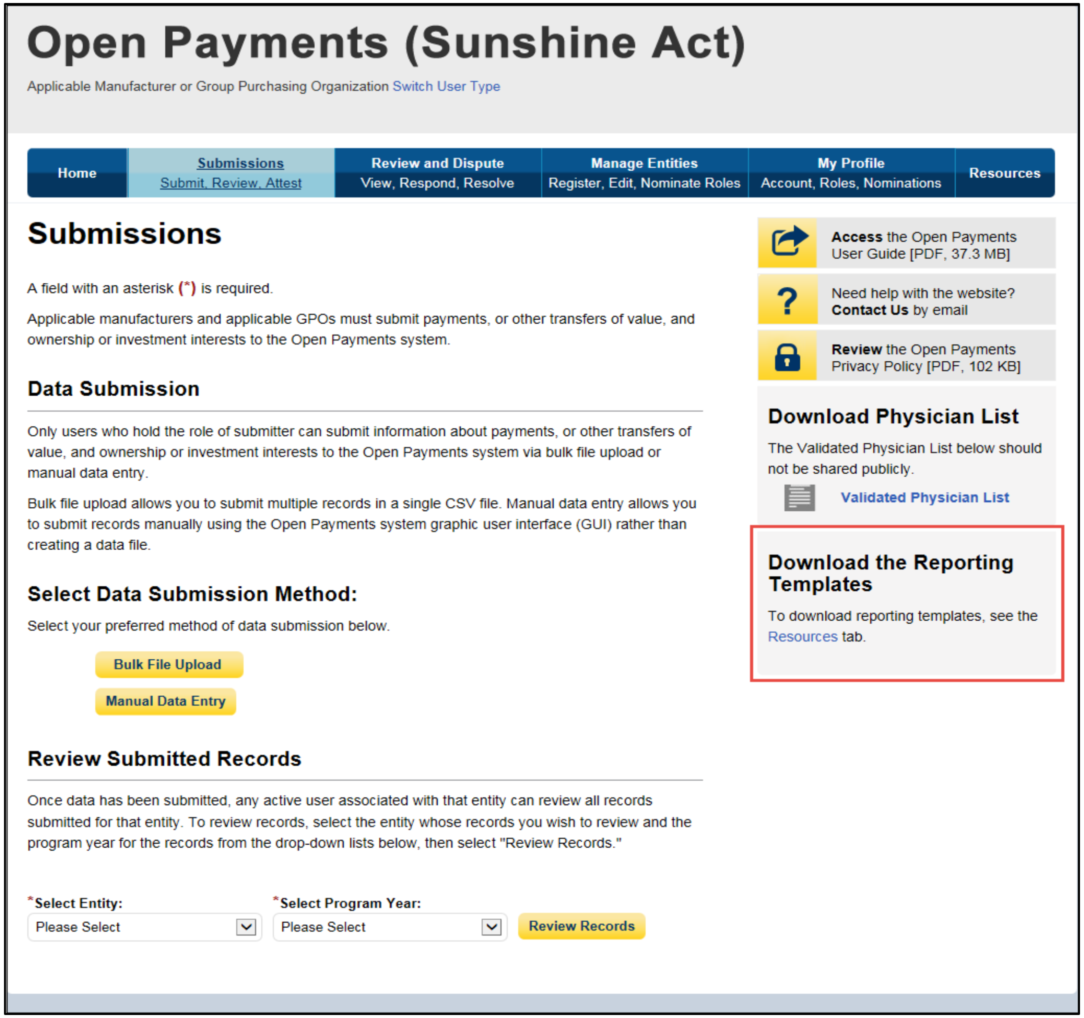
- **Home System Payment ID is manually editable**
  - A new section titled “Record Information” has been added to the Edit Payments page. The Home System Payment ID appears in this section and can be manually edited



Data Submission Enhancements: General

- **Updated Submissions Home Page**
  - "Download the Reporting Templates" box added to the Submissions landing page refers users to the "Resources" tab

Note: The "Download the Reporting Templates" box is only visible to users with a submitter role in the system



Data Submission Enhancements: Resources Tab

- **Resources Tab**
  - Links to all reporting templates and the User Guide are available on the "Resources" page (previously the "Help" tab)

Note: Templates are only visible to users with a submitter role in the system. All other users will only see the Open Payments User Guide on the "Resources" tab

Open Payments (Sunshine Act)

Applicable Manufacturer or Group Purchasing Organization Switch User Type

Home	Submissions Submit, Review, Attest	Review and Dispute View, Respond, Resolve	Manage Entities Register, Edit, Nominate Roles	My Profile Account, Roles, Nominations	Resources

Open Payments Resources

Report templates are available through the links below. Download the template(s) for the program year(s) and payment category/categories for the records to be submitted. The system will reject files prepared with an incorrect payment category or program year template.

Select the link to the User Guide for more information on using the Open Payments system.

Resources

- Open Payments User Guide [PDF, 37.3 MB]

Reporting Templates

Research

- 2013 - 2015 Research Template [CSV, 2 KB]
- 2016 Research Template [CSV, 2 KB]

General

- 2013 - 2015 General Template [CSV, 1 KB]
- 2016 General Template [CSV, 1 KB]

Ownership

- 2013 - 2016 Ownership Investor Template [CSV, 1 KB]

Data Submission Enhancements: Record Field Change

For program year 2016 and upcoming years, the values for the “Form of Payment or Transfer of Value” data element in General and Research records are as follows:

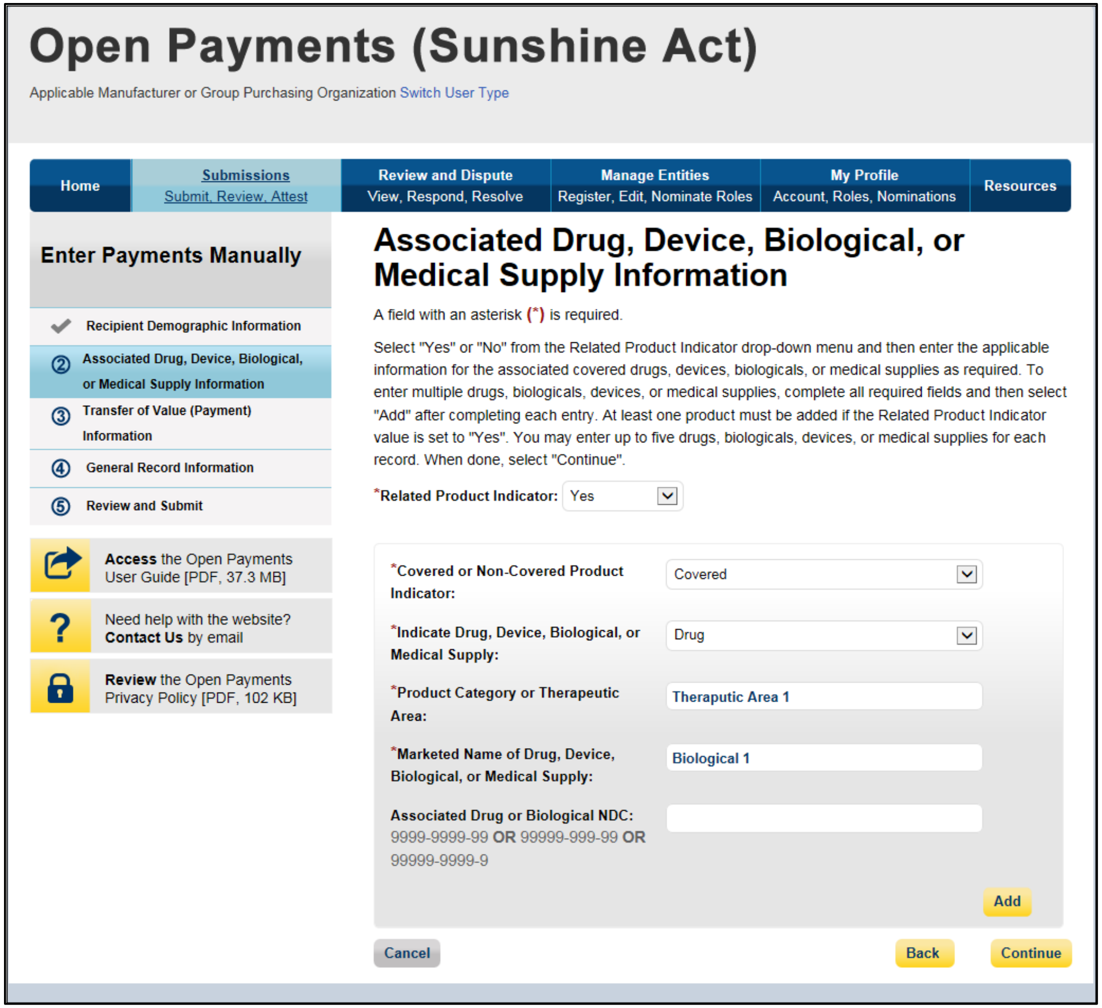
New Values

- “1" = Cash or cash equivalent;
- "2" = In-kind items and services;
- "3" = Stock;
- "4" = Stock option;
- "5" = Any other ownership interest;
- "6" = Dividend, profit or other return on investment

Values for the “Form of Payment or Transfer of Value” for prior program years are unchanged

Data Submission Enhancements: Record Limit Change

- **The number of products (i.e., drug, device, biological, or medical supply) that can be included in a single record has changed for Program Year 2016 and upcoming years**
  - For Program Year 2016 and upcoming years, users are allowed to enter a maximum of 5 products (i.e., drug, device, biological, or medical supply) per record
  - For Program Years 2013-2015, the product limit for records is unchanged (i.e., up to 5 drugs or biologicals and up to 5 devices or medical supplies per record)



Data Submission Enhancements: Data Validation

- **Updated Error messages when incorrect Primary Type is entered**
  - Users will receive a detailed error message if a payment record submitted for a physician without an NPI fails matching because the entered primary type does not correspond to the provided licenses. This message will be displayed on the Record Details page and, if the record was submitted by bulk file upload, also in the downloadable Error Report.

Error Code	Data Element Name(s)	Error Description
E-420	Physician Primary Type; Covered Recipient Physician Primary Type	Physician Primary Type does not match the information in validation sources used by Open Payments
E-421	Ownership/Investment Physician Primary Type	Ownership/Investment Physician Primary Type does not match the information in validation sources used by Open Payments
E-422	Principal Investigator Physician Primary Type	Principal Investigator Primary Type does not match the information in validation sources used by Open Payments

Data Submission Enhancements: Data Validation

- **Updated Error messages when physician cannot be matched as a covered recipient**
  - Physicians, including principal investigators, who have an NPI will fail matching and receive an error message if they cannot be confirmed as a covered recipient by CMS's validation source. Note that this also affects physician registration, as physicians will fail vetting if CMS cannot confirm they are a covered recipient. Below are the error messages that the reporting entity will see in the Error Report when a physician fails matching for this reason:

Error Code	Data Element Name(s)	Error Description
E-423	Physician First Name; Physician Last Name; License State and Number; NPI; Primary Type	Physician information does not match a covered recipient in the validation sources used by Open Payments
E-424	Principal Investigator First Name; Principal Investigator Last Name; License State and Number; NPI; Primary Type	Principal Investigator information does not match a covered recipient in the validation sources used by Open Payments

Data Submission Enhancements: Bulk File Upload Validations

- **Updated Record Validation Process for Bulk File Upload**
  - Records submitted via bulk file upload in the Open Payments system must pass several validation steps in order to become eligible for final submission and attestation
  - The validation process for bulk file upload now has four steps:
    1. File Validation
    2. Pre-Upload Record Validation
    3. Record Validation
    4. Matching Validation
  - Notification emails are sent for errors at each step
  - Errors are listed in the email or in a downloadable Error Log depending upon the step where the error is found
  - Note: Manual data entry validation has not changed and consists of steps 3 and 4 only

Data Submission Enhancements: Data Validation

- ***Step 1: File Validation (bulk files only)***
  - Validations of the file itself (e.g., file size and format, number of columns, etc.)
  - Validations of the upload process (e.g., payment category selected at file upload matches payment category of file, etc.)
  - A list of file validations is available in the “Record Validation and Matching” section of the Open Payments User Guide

Data Submission Enhancements: Data Validation

- ***Step 2: Pre-Upload Record Validation (bulk files only) & Step 3: Record Validation***
  - Validations of individual records to determine if all required fields are filled; if the information in the fields meet formatting requirements; and, if the record is a resubmission or has been submitted to delete or renew the delay in publication request for an existing record, an original version of the record exists within the Open Payments system
  - Step 2 validations are performed only on records submitted via bulk file, before the records are saved into the Open Payments system. Users will be notified via email only if any records fail the validations performed at this step; error messages for these errors are not available on the user interface
  - Step 3 validations are performed on records submitted via bulk file after the record is saved and on records submitted manually during the record entry process
  - Record field requirements are detailed in Submission Data Mapping Documents. Refer to the Submission Data Mapping Document that corresponds to the record's program year

Data Submission Enhancements: Data Validation

- ***Step 4: Matching Validation***
  - The Open Payments system matches the covered recipient identifying information in individual records (e.g., Physician First Name, Teaching Hospital Address, etc.) with valid covered recipients using existing CMS resources and information
  - If the information in a record cannot be matched, the record will fail matching validation
  - More information on matching is available in the “Record Validation and Matching” section of the Open Payments User Guide

Data Submission Enhancements: Data Validation

- **Error Notifications**
  - Errors in files or records submitted via bulk file upload will be communicated to users via notification emails
  - Step 3 errors in records submitted manually will be communicated via on-screen messages during the entry process
  - Manually entered records that fail matching validation (Step 4) will trigger a notification email

Review and Dispute Enhancements

- **Updated Columns on Review and Dispute grid for reporting entities**
  - To reduce scrolling, the following columns have been removed from the grid:
    - File ID
    - Date of Payment
    - Dispute Last Modified By
    - Records Status

The columns on the grid have been re-ordered. See an example below:

Show Entries 10

Acknowledge Dispute | Resolved No Change

Select All	Action	Record ID	Home System Payment ID	Dispute ID	Recipient	Total Payment Amount or Dollar Amount Invested	Value Of Interest	Review and Dispute Status	Date Dispute Initiated	History of Disputes	Delay in Publication of Research Payment Indicator	Marked for Deletion:
	View Edit	1257520	101	4517	Craig Hospital	$76,767.22		Resolved	2016-04-11	View	No	Yes
	View Edit	766649	TH_test	4382	ST. ROSE DOMINICAN - SIENA	$333.23		Resolved No Change	2016-01-04	View	No	No
	View Edit	766649	TH_test	4379	ST. ROSE DOMINICAN - SIENA	$333.23		Resolved No Change	2016-01-04	View	No	No

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Next Steps & Available Resources

Next Steps

For New Reporting Entities

- Register in EIDM and request access to the Open Payments system
- Register self and reporting entity (if applicable) in the Open Payments system
- Assign user roles
- Continue collecting 2017 payment data, and prepare to report it in early 2018

For Returning Reporting Entities

- Ensure EIDM account has not been deactivated due to inactivity and reset password if necessary
- Recertify reporting entity information and provide required review and dispute contact information
- Confirm user roles
- Continue collecting 2017 payment data and prepare to report it in early 2018

Data Submission and Attestation Resources

- Resources to help reporting entities ensure accurate data submission include:
  - Validated Physician List
  - Teaching Hospital Lists
    - 2017 Teaching Hospital List is now available
    - Teaching Hospital Lists for previous program years are still available for records that need to be created or edited
  - Program year 2013 submissions should be made using the hospital's legal name
  - **Submissions for all other program years should be made using the hospital's "doing business as"** name instead of legal name
  - All Teaching Hospital Lists are available on the Resources page of the Open Payments website

Available Resources

- Review available resources on the CMS Open Payments website Resources page at https://www.cms.gov/OpenPayments/About/Resources.html:
  - Open Payments User Guide
  - Tutorials
  - Quick Reference Guides
- Register for CMS email notifications via the Open Payments website to receive email updates about Open Payments
- For additional questions, you can also contact the Open Payments Help Desk at:
  - openpayments@cms.hhs.gov
  - 1-855-326-8366